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Date: August 15, 2005

To: Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence
Ave., SW. Room 4008
So., Ag Stop 0268
Washington, DC 20250

From: Rick Buckner, Ph.D., General Manager, Clarkson Grain, Co.

Subject: **Reclassification of Yeast as an "Agricultural Product"**

I support the July 30, 2004 request by Marroquin International Organic Commodities Services to reclassify yeast as an "agricultural product" from its current classification as a "nonagricultural substance". This change is requested to allow organic yeast to become an organic ingredient.

I further support the rationale submitted on August 1, 2005 by Nick Bloomquist of Spectrum Organic Products Inc. Both yeast and mushrooms are natural, living organisms classified in the fungi kingdom. Both can be grown on natural, organic agricultural materials. Since they can be grown under conditions where they obtain their nutrients from natural, agricultural materials, they should be considered organic when grown and harvested under these conditions. The actual method of reproduction is immaterial in determining whether or not yeast is organic or not.

Similar to organic mushrooms, certified organic yeast grown under organic conditions are available today. Since the NOP policy requires the maximum use of organic ingredients and since organic yeast is available today, I request that the NOSB support and reclassify yeast as an "agricultural product" which would require organic food processors to use organic yeast.

Sincerely yours,

A handwritten signature in black ink that reads 'Rick Buckner'.

Rick Buckner, Ph.D.
Executive VP/General Manager